

FILED

Jul 07, 2022

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT

for the
Eastern District of California

SEALED

United States of America
v.

RONDELL CRAMER

Case No. 2:22-mj-107-DB

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 6/1/2021 in the county of Solano in the
Eastern District of California, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See Affidavit of ATF Special Christopher Bailey, attached hereto and incorporated by reference.

☒ Continued on the attached sheet.

/s/ Christopher Bailey

Complainant's signature

Special Agent Christopher Bailey, ATF

Printed name and title

Sworn to me and signed via telephone

Date: July 7, 2022

City and state: Sacramento, California



DEBORAH BARNES

UNITED STATES MAGISTRATE JUDGE

SEALED

AO 91 (Rev. 11/11) Criminal Complaint

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Printed name and title

Sworn to me and signed via telephone

Date:

*Judge's signature*City and state: Sacramento, CaliforniaDeborah Barnes, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Christopher Bailey, a Special Agent with the United States Bureau of Alcohol, Tobacco, Firearms and Explosives, being duly sworn, state:

I. INTRODUCTION

1. I have been employed as a Special Agent with ATF since February 2009. I am presently assigned to the ATF Oakland Field Office in Oakland, California. I am a law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7). I am a graduate of the Criminal Investigator Training Program at the Federal Law Enforcement Training Center and Special Agent Basic Training at the ATF National Academy. The training that I received at the academy included formalized instruction in, among other things: firearms, drugs, and violent crime-related investigations, familiarization with United States firearms laws, financial investigations and money laundering, identification and seizure of drug and firearms tracking related assets, physical and electronic surveillance, weapon qualification and tactics, operation and use of confidential sources, and undercover operations. Prior to working as an ATF Special Agent, I worked as an industry operations investigator for the ATF and investigated federal firearm and explosive licensees, including manufacturers, importers, and dealers of firearms, for compliance with the Gun Control Act and the Code of Federal Regulations.

2. As an ATF Special Agent, I have conducted and participated in both state and Federal investigations involving the illegal possession and trafficking of firearms. I have investigated and assisted in the prosecution of criminal street gangs engaged in illegal narcotics and firearms trafficking. During these investigations, I have participated in and/or served as the primary case agent in cases involving various types of investigative techniques, including the use of electronic surveillance, assistance from undercover agents and informants, and the controlled purchases of firearms and narcotics from suspects. I have also participated in physical surveillance operations and the execution of state and federal arrest warrants and search warrants, resulting in state and federal prosecution of defendants. In addition to utilizing the aforementioned investigative techniques, I have been required during these investigations to analyze information resulting from traditional record searches, pen registers and trap and trace devices, financial records, utility records, and telephone toll and subscriber

1 records. My work with informants and cooperators has involved, among other things, monitoring
2 meetings and recorded conversations, and generally evaluating the reliability and truthfulness of an
3 informant/cooperator. Because of my training and experience, I have become familiar with the way
4 illegal firearm and drug traffickers smuggle, transport, store, conceal, and distribute firearms and drugs,
5 as well as how they collect, and launder proceeds related to such activities. I am also familiar with the
6 way these individuals use telephones, coded communications, false or fictitious identities, and other
7 means to facilitate illegal activities and thwart law enforcement investigations. I have also consulted
8 and discussed these investigations with other law enforcement officers and agents who are experienced
9 in these types of investigations.

10 3. As a result of my training and experience, I have become familiar with the way illegal
11 firearm and drug traffickers smuggle, transport, store, conceal and distribute firearms and drugs, as well
12 as how they collect, and launder proceeds related to such activities. I am also familiar with the way
13 these individuals use telephones, coded communications, false or fictitious identities, social media, and
14 other means to facilitate illegal activities and thwart law enforcement investigations. I have also
15 consulted and discussed these investigations with other law enforcement officers and agents who are
16 experienced in these types of investigations.

17 4. This affidavit is intended to show only that there is sufficient probable cause for the
18 requested warrant and does not set forth all my knowledge about this matter.

19 5. I respectfully submit this Affidavit in support of a Criminal Complaint charging Rondell
20 Cramer ("CRAMER") with Felon in Possession of a firearm, in violation of 18 U.S.C. §§ 922(g)(1) (the
21 Target Offense).

22 6. Because this affidavit is being submitted for the limited purpose of securing a criminal
23 complaint and an arrest warrant for CRAMER, I have not included every fact known to me concerning
24 this investigation. I have set forth only those facts that I believe are necessary to establish probable
25 cause to believe that has and/or continues to commit the Target Offense.

26 //

27 //

28 //

1 **II. FACTS ESTABLISHING PROBABLE CAUSE**

2 **A. June 1, 2021 – CHP Arrested CRAMER on Two Outstanding Warrants and**
3 **Discovered a Glock Firearm (Among Other Evidence) In His Vehicle**

4 7. On this date, a CHP officer pulled over a vehicle that did not have a rear license plate, a
5 violation of California Vehicle Code 5200. The stop occurred in Fairfield CA. After identifying
6 CRAMER as the driver and sole occupant of the vehicle, the officer discovered CRAMER to have two
7 outstanding felony warrants and subsequently placed him under arrest.

8 8. The officer conducted an inventory search prior to towing CRAMER's vehicle. During
9 this search, the officer located several black trash bags which contained a large amount of retail
10 merchandise with anti-theft tags affixed. The officer requested assistance from the CHP Organized
11 Retail Crime Task Force (ORCTF). Investigator Diehl of the CHP ORCTF responded to the CHP
12 Solano Area Office. The officer provided Inv. Diehl with the bags located inside of the vehicle, as well
13 as two phones in CRAMER's possession at the time of his arrest. The phones were identified as a Black
14 Samsung cellular phone, IMEI: 351558962323244 and a Samsung cellular phone in plastic case, IMEI:
15 359823618911335

16 9. Inv. Diehl contacted CVS Investigator Ryan Puryear to assist with the investigation.
17 Puryear determined that the merchandise was designated for sale from CVS and Walgreens stores in
18 Arizona, and the total approximate value of the stolen items were \$10,297.72. Inv. Diehl determined that
19 a thorough search of the vehicle had not occurred, but rather only a visual search for inventory. Inv.
20 Diehl obtained a search warrant for the vehicle and executed it on the same day. Inv. Diehl located the
21 following items of note:

- 22 a. A Glock 48, 9mm handgun, S/N: AFPS385, w/seven live rounds of 9 mm ammunition in
23 the magazine.
- 24 b. Two speed loaders (one rifle and one pistol),
- 25 c. One round of .45 ACP ammunition, and
- 26 d. Multiple items of paperwork, mail, correspondence, a California Identification Card, and
27 a credit card, all for CRAMER,
- 28 e. A bill of sale for an Arizona private party firearm transaction (Desert Eagle model

U1911, 45 ACP, S/N: U104737, seller: C.M., buyer: Anthony Thompson,¹ date: May 21, 2021), A California Driver's License in the name of D.C.



FIGURE 1: PICTURE OF THE FIREARM SEIZED FROM CRAMER'S VEHICLE ON JUNE 1, 2021.

10. CRAMER was arrested for active warrants on June 1, 2021. He posted bail and was released on the same day.

B. CRAMER's Criminal History

11. I have reviewed CRAMER's criminal history and observed that he had been convicted of the following felonies, each punishable by greater than one year in prison, prior to May 1, 2021.

- 1996 conviction for violation of California Health & Safety Code 11360(a), Sell/Furnish Marijuana/Hash.
- 1997 conviction for violation of California Penal Code 12021(A)(1), Felon in possession of a firearm, for which he received a sentence of one year in jail.

¹ At this time, law enforcement has not determined whether Anthony Thompson is a coconspirator in this crime. As discussed below, officers have since learned that CRAMER's face is currently on file with the Arizona DMV for Anthony Thompson's driver's license.

- 1999 conviction for violation of California Vehicle Code 10851(A), Taking a vehicle without owner's consent, for which he received a sentence of 16 months in prison.
- 2003 conviction for violation of California Penal Code 487(A), Grand theft.
- 2011 conviction for violation of California Health & Safety Code 11360(A), Sell/Furnish Marijuana/Hash.
- 2016 conviction for violation of California Penal Code 487(A), Grand theft, for which he received a sentence of two years in jail.

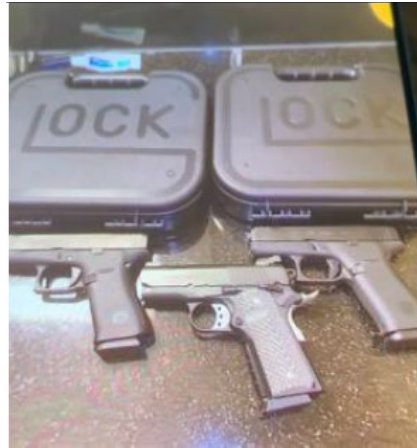
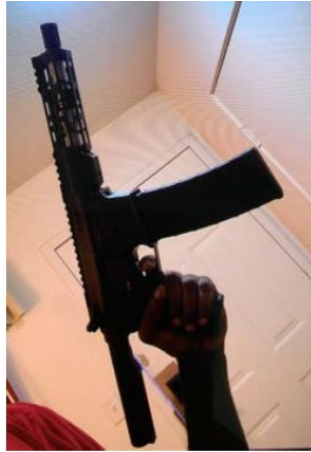
C. Interstate Nexus

12. An ATF Interstate Nexus Expert has examined photographs of the Glock 48, 9 mm pistol with S/N: AFPS385 recovered from CRAMER's vehicle. Based on this expert's training and experience, this firearm was not manufactured in the state of California and thus must have traveled in interstate commerce prior to being possessed on June 1, 2021, in the Eastern District of California.

D. Evidence of CRAMER's Illegal Arms Trafficking and Other Crimes

13. On June 2, 2021, Inv. Diehl obtained a search warrant for both of CRAMER's phones. On June 30, 2021, Inv. Diehl received the phone extraction from the black Samsung cell phone with IMEI: 351558962323244 and determined the phone number associated to it was 510-988-1826 and had been activated on or about March 2, 2021. Inv. Diehl reviewed the "chats" on CRAMER's cellular phone and located dozens of conversations via Instant Message, Facebook Messenger, and Snapchat regarding the purchase and sales of firearms ammunition, retail merchandise, and controlled substances. Many of the conversations included CRAMER describing the contraband he was purchasing in the State of Arizona and his plan to traffic the contraband back to California for resale.

14. The following images were extracted from CRAMER's phone. On May 26 and 27, 2021, CRAMER engaged in a text conversation with another person. During this conversation, he offered the firearms depicted below for sale.



15. The following image was also extracted from CRAMER's phone. This picture contains metadata that reveals it was taken on May 28, 2021, in San Francisco, CA. A subsequent trace revealed this firearm was purchased in Glendale, Arizona on August 15, 2019.



16. The following image is a still from a video extracted from CRAMER's phone. Forensic data reveals this video was uploaded to CRAMER's Snapchat account on March 10, 2021. In my training and experience, individuals engaged in firearms and narcotics trafficking online often sell their contraband on social media platforms like Snapchat. Based on my training and experience, I believe the image below appears to depict items consistent with cocaine packaged for sale.






17. The following photograph is also a still image extracted from a video on CRAMER's phone(s). Forensic data reveals this video was uploaded to CRAMER's Snapchat account on August 19, 2019. In my training and experience, 'Smackers' is a term often used to describe MDMA (ecstasy).



18. The following photographs depict images that were extracted from CRAMER's phone. It should be noted that Anthony Thompson is the name listed as the buyer of a Desert Eagle firearm on a bill of sale seized from CRAMER's vehicle on June 1, 2021. Anthony Thompson was determined to be a real individual previously assigned Missouri driver's license T981046010. This license was surrendered on May 19, 2021, for the state of Arizona to issue driver's license D10326844. The following photographs were found on the extraction from CRAMER's phone(s). They depict the Arizona driver's license in the name of Anthony Thompson and a Social Security card under the same name. I have reviewed the photograph of Anthony Thompson on file for the previous Missouri driver's license as well as numerous photographs of CRAMER, to include his California driver's license and the current fraudulent Arizona driver's license under Thompson's name. The photograph of the Arizona driver's license below, which was observed on CRAMER's phone, appears to be the real Anthony Thompson.



19. I conducted DMV queries for CRAMER's California driver's license (image (a) in the table below), Anthony Thompson's Arizona driver's license (b), and Anthony Thompson's Missouri driver's license (c). Comparison of the three photographs show that the Arizona driver's license (D10326844) assigned to Anthony Thompson has a photograph of CRAMER.

		
<p>(a) Picture currently on file with the CA DMV for CRAMER's driver's license</p>	<p>(b) Picture currently on file with the DMV for Anthony Thompson's Arizona driver's license</p>	<p>(c) Picture on file with the DMV for Anthony Thompson's previous Missouri driver's license.</p>

20. Subsequent forensic analysis of the cellular phones found in CRAMER's vehicle revealed multiple conversations wherein CRAMER identified himself as Anthony to potential sellers of firearms.

21. The following images were extracted from CRAMER's phone. Investigators were unable to determine when these photographs were taken. The images depict CRAMER holding a bag of suspected marijuana in one and a semi-automatic pistol in the other.



22. The following image was extracted from CRAMER's phone and was captured in August of 2020. The image depicts an individual, suspected to be CRAMER, with multiple handguns sitting on his lap.



1. ***Firearms Traces***

23. ATF conducted firearms traces for the Glock pistol recovered in CRAMER's vehicle, the firearm bill of sale, as well as firearms with visible serial numbers in photographs observed on CRAMER's phone extraction. I discovered the following:

- a. A Glock 48, 9 mm handgun with S/N: AFPS385 – purchased by M.P. on May 13, 2021, in Scottsdale, Arizona. The firearm was recovered in Fairfield, CA, in CRAMER's possession, on June 1, 2021 (resulting in a 19-day time to crime).
- b. A Bul Transmark Ltd Desert Eagle 1911U, .45 caliber handgun with S/N: U104737 – purchased by C.M. on April 14, 2021, in Phoenix, Arizona. This firearm has not yet been recovered, however the bill of sale recovered in CRAMER's vehicle indicated a sale date

of May 21, 2021, to Anthony Thompson (one of CRAMER's aliases), only 37 days after C.M.'s purchase.

- c. A Glock 43x, 9mm handgun with S/N: BTGL398 – purchased by J.H. on April 27, 2021, in Apache Junction, Arizona. This firearm has not yet been recovered but was purchased only approximately 42 days prior to seizure of the phone.
- d. A HS Produkt XD-40, .40 caliber handgun with S/N: GM160036 – purchased by J.C. on April 1, 2020, in Sierra Vista, Arizona. This firearm was recovered by Fremont PD in relation to a domestic assault on August 12, 2021, where the possessor of the firearm had multiple prior felony convictions.
- e. A Karri's Guns KG15, .223 caliber pistol with S/N: S00597 – purchased by K.G. on August 15, 2019, in Glendale, Arizona. This firearm has not been recovered.

2. *GPS Location Information Reveals Travel Consistent with Arms Trafficking and Interstate Transport of Stolen Goods*

24. On November 8, 2021, a United States Magistrate Judge for the Eastern District of California authorized a search warrant (2:21-sw-0850 CKD) for real-time tracking of CRAMER's cellular phone. Beginning on November 9, 2021, T-Mobile provided location information for CRAMER's cellular phone in 15-minute intervals. Data showed that from on or about November 9, 2020, to November 12, 2021, CRAMER traveled between the Portland, Oregon and Tacoma, Washington areas. Based on Investigator Diehl's investigation into CRAMER's retail theft activities, it appears he was actively engaging in theft from retail stores during this time.

25. On or about the night of November 13, 2021, into the morning of November 14, 2021, location information appeared to show CRAMER around his girlfriend's residence located in Fairfield, California before spending a portion of November 14, 2021, in the San Francisco and Oakland, California areas.

26. On or about November 15, 2021, location information showed CRAMER traveling to Central California and then Las Vegas, Nevada. Over approximately the next week, CRAMER's location information showed him making multiple trips to and from the Las Vegas, Nevada, Phoenix, Arizona, and Tucson, Arizona areas.

1 27. GPS Location information showed CRAMER traveling to CVS and Walgreen's store
2 locations in Arizona. Stolen merchandise later recovered from CRAMER on November 24, 2021, was
3 determined to have been stolen from Arizona locations. Additionally, suspect descriptions of the
4 individual(s) involved in the thefts match the description of CRAMER.

5 28. Based on Investigator Diehl's retail theft investigation as well as review of CRAMER's
6 cellular phones seized on June 1, 2021, it has been determined that CRAMER conducts retail theft in
7 various states, fences those goods to known individuals in the San Francisco Bay Area, and then travels
8 to Arizona to purchase firearms, which he brings back to the state of California.

9 3. ***Identification of Firearms Obtained by CRAMER and Interview of Firearm***
10 ***Sellers in Arizona***

11 29. Based on my training and experience as well as my review of data extracted from
12 CRAMER's cellular phones seized during his arrest on June 1, 2021, I believed that CRAMER was
13 conducting private party firearm purchases from individuals in Arizona selling firearms on websites
14 such as Armslist.com using the alias of Anthony Thompson. For this reason, I began identifying these
15 possible sellers of firearms based on the phone numbers used to communicate with CRAMER.

16 30. On May 24, 2022, CRAMER exchanged a text message conversation with phone number
17 XXX-XXX-1838.² In the text exchange, CRAMER identified himself as "Anthony" and inquired about
18 purchasing a "M&P 9mm." The phone number was determined to belong to F.J.

19 31. On March 3, 2022, agents interviewed F.J. F.J. confirmed his phone number XXX-
20 XXX-1838. Jones was shown a photograph of CRAMER from the Arizona license in Thompson's
21 name. F.J. was unsure about recognizing the photograph. F.J. was able to find a text message
22 conversation with CRAMER on May 24, 2021. F.J. indicated that he did in fact sell that individual
23 (CRAMER) a Smith & Wesson M&P Shield 9mm caliber pistol bearing serial number JFN7952.

24
25
26
27 ² I have anonymized the names and numbers of the people CRAMER is contacting to purchase
28 guns because it appears that many may have been unwitting participants in these illegal firearm
transactions.

32. On May 24, 2022, CRAMER exchanged a text message with phone number XXX-XXX-4539. In the text exchange, CRAMER inquired about purchasing a “g3c 9mm” for \$650. This phone number was determined to belong to J.C.

33. On March 3, 2022, agents interviewed J.C. J.C. confirmed his phone number XXX-XXX-4539. J.C. was shown the same photograph of CRAMER but did not recognize the photograph. While J.C. did state that he had sold some firearms between January and June 2021, he did not think that he had sold any to CRAMER.

34. On May 24, 2021, CRAMER sent a text message to phone number -XXX-XXX-3140. In the message, CRAMER identified himself as “Anthony” and inquired about an “M&P”.

35. On March 3, 2022, agents interview J.T. J.T. confirmed his phone number XXX-XXX-3140. J.T. advised that he had not sold any firearms to anyone who looked like CRAMER however he was able to find a text message from CRAMER. J.T. stated that this was in response to a Smith & Wesson M&P Shield 9mm pistol he had posted to Armslist.com.

36. On May 25, 2021, CRAMER sent a text message to phone number XXX-XXX-8115. In the message, CRAMER identified himself as “Anthony” and inquired about purchasing a firearm.

37. On March 3, 2022, agents interviewed J.R. J.R. confirmed his phone number XXX-XXX-8115. J.R. stated that he had sold some Glock firearms but did not recognize or recall selling firearms to CRAMER. J.R. indicated that he had posted firearms for sale on Armslist.com

38. On May 26, 2021, CRAMER exchanged a text message conversation with phone number XXX-XXX-0167 where he advised that he was in possession of “2 gleasy”³ and a “sig p365”. CRAMER also sent photos and video in which law enforcement could observe a Glock 43X 9mm caliber pistol, bearing serial number BTGL398. A firearm trace revealed that this firearm was purchased on April 26, 2021, by J.H. in Arizona.

39. On March 3, 2022, agents contacted J.H. via phone number XXX-XXX-9955. Agents requested information regarding the Glock 43X bearing serial number BTGL398. J.H. indicated that he was on vacation but would check his records when he returned home. Subsequent attempts to reach J.H.

³ In my training and experience, those engaged in illegal firearms transactions often use code words or slang to describe firearms. I believe the term “gleasy” refers to a Glock firearm.

1 have been unsuccessful. J.H. was previously contacted by ATF Phoenix Field Division regarding his
2 high volume of firearm sales.

3 40. During the June 1, 2021, search of CRAMER's vehicle pursuant to a state search warrant,
4 a firearm transaction receipt was recovered showing a firearm sale on April 14, 2021, from C.M.R. to
5 "Anthony Thompson". The firearm detailed in the sale was a Bul Transmark Desert Eagle 1911U .45
6 caliber pistol, bearing serial number U104737. A photograph of the firearm was found saved to
7 CRAMER's phone on May 29, 2021. A firearm trace confirmed that it was purchased in Arizona by
8 C.M.R. on April 14, 2021, the same date it was sold to CRAMER.

9 41. Agents have made attempts to locate C.M.R. with no success. Previous attempts had
10 been made prior to this investigation, with no success, by ATF Phoenix Field Division due to his high
11 volume of firearm sales.

12 42. On May 23, 2022, CRAMER exchanged a text message conversation with phone number
13 XXX-XXX-0739. The user of this phone was identified as B.K. During the exchange, CRAMER
14 identified himself as "Anthony" and inquired about purchasing a "Gloc". During the conversation, the
15 two parties argue over CRAMER being asked to send a copy of his Arizona identification prior to the
16 transaction.

17 43. On March 4, 2022, agents interviewed B.K. B.K. confirmed his phone number XXX-
18 XXX-0739. B.K. did not recognize the photograph of CRAMER however he did remember someone he
19 considered "sketchy" trying to buy a Glock 32 he had posted for sale. He remembered the individual not
20 wanting to send him a driver's license photograph prior to them meeting. B.K. stated that he ended up
21 selling the Glock pistol to someone else.

22 44. On May 26, 2021, CRAMER exchanged a text message conversation with phone number
23 XXX-XXX-5776. During the conversation, CRAMER identified himself as "Anthony" and inquired
24 about purchasing an "AR 15". Based on the conversation, it appears as though the two parties met to
25 conduct a firearm transaction.

26 45. On March 5, 2022, agents interviewed C.F. C.F. confirmed his phone number XXX-
27 XXX-5776. C.F. did not recognize a photograph of CRAMER however he did indicate that he had sold
28 approximately 15 firearms within the last year. C.F. was able to locate a text message conversation with

1 CRAMER on May 26, 2021. C.F. indicated that he sold that individual (CRAMER) an AR-15 type
2 pistol and provided a photograph of the firearm.

3 46. Photographs of a Karri's Guns KG15 .223/5.56mm caliber pistol, bearing serial number
4 S00597 was observed on both CRAMER's phones seized on June 1, 2021. The photographs were saved
5 on May 27 and 28, 2021, and geo-location information placed the capture location around Interstate 10
6 near Cabazon, California. Additionally, the photo appears to be taken on CRAMER's lap inside his
7 Mercedes Benz while on the freeway. The photograph also depicts a high-capacity drum magazine
8 attached to the firearm. A trace of this firearm revealed that it was purchased by K.G.

9 47. On March 7, 2022, agents spoke with K.G. via phone. K.G. advised that she remembered
10 the Karri's Guns KG15 pistol that she had purchased and later sold. On March 8, 2022, K.G. provided
11 agents with a photograph of a receipt from Sammy D's Discount Arms in Arizona which included the
12 purchase of the Karri's Guns KG15 .223/5.56mm caliber pistol bearing serial number S00597 on August
13 15, 2019. K.G. stated that she gifted the firearm to her brother-in-law, T.O., in December of 2019. K.G.
14 further provided an email exchange between T.O. and an individual using email in the name of C.F.'s
15 wife on May 24, 2021. In this email exchange, they discuss the firearm sale, and the subject provides
16 phone number XXX-XXX-5776 (C.F.'s phone number).

17 48. On March 11, agents spoke with T.O. via phone number XXX-XXX-4493. T.O.
18 confirmed the information provided by K.G. in that he had sold the firearm on May 24, 2021. T.O.
19 identified an Arizona driver's license photograph of C.F. as the individual he sold the Karri's Guns
20 KG15 pistol to.

21 49. On May 22, 2021, CRAMER exchanged a text message conversation with phone number
22 XXX-XXX-3514. During the conversation, CRAMER identified himself as "Anthony" and inquired
23 about purchasing a "glock".

24 50. On March 22, 2022, agents interviewed D.C. via phone number XXX-XXX-3514. D.C.
25 advised that he remembered meeting with an "Anthony Thompson" and a woman (name unknown) to
26 sell a firearm. When he met this subject, there was some confusion as to who was purchasing the
27 firearm. "Thompson" then indicated that the firearm was for his girlfriend, who eventually signed a bill
28 of sale for the purchase of a Glock 22 .40 caliber pistol bearing serial number RVS944. SA Bailey

1 provided D.C. with a photograph of CRAMER's Arizona driver's license in the name of Anthony
2 Thompson and D.C. indicated that he believed that was the individual he had met to sell the firearm on
3 May 30, 2021. D.C. also provided the bill of sale signed by Andrea Diaz, Arizona driver's license
4 D09420040, 1825 W. Ocotillo Rd #92, Phoenix, Arizona.

5 51. A photograph of an HS Produkt Springfield XD-40 pistol, bearing serial number
6 GM160036 was observed on CRAMER's phone by accessing the physical phone. The image was
7 captured in August of 2020. A trace of the firearm shows that it was purchased by J.C. of Huachuca
8 City, Arizona on April 1, 2020. This firearm was recovered by the Fremont Police Department in
9 California on August 12, 2021.

10 52. On March 31, 2022, agents interviewed J.C. She indicated that she remembered the
11 Springfield XD40 pistol and that she had sold the firearm to her friend's mother, D.W. in June, or July
12 of 2020. She further indicated that D.W. is now deceased after passing away later that year.

13 53. A photograph an Anderson Manufacturing AM-15 .223/5.56mm caliber pistol/rifle,
14 bearing serial number 16007840 was observed in CRAMER's phone. A firearm trace revealed that it
15 was purchased by C.L. on March 4, 2016, in Wittmann, Arizona. C.L. has not yet been contacted
16 regarding this firearm.

17 54. A photograph saved on April 3, 2021, was observed in CRAMER's phone showing a
18 Smith & Wesson M&P Shield 9mm caliber pistol, bearing serial number NJW3740 on top of a green
19 pool table. A firearm trace revealed that this firearm was purchased by J.G. on April 3, 2021. Geo-
20 location information for the photograph showed that it was taken inside J.G.'s residence at in Tucson,
21 Arizona. J.G.'s is believed to be CRAMER's cousin or close associate and has not been contacted. J.G.
22 also has firearms purchased by him in Arizona that were recovered out of state.

23 55. From May 9, 2021, to May 13, 2021, CRAMER exchanged a text message conversation
24 with phone number XXX-XXX-2784. During this conversation, the user appears to be asking
25 CRAMER for firearms and a machinegun conversion device. It is unclear whether a transaction ever
26 took place. AT&T records showed the subscriber of this phone to be Charles Beal. Beal has since been
27 arrested and charged for a murder taking place on June 25, 2021, in Oakland, CA in which a firearm was
28 utilized. It is unclear at this time whether CRAMER sold Beal a firearm.

1 56. Numerous other messages were observed in which CRAMER purports himself as
2 Anthony Thompson in an attempt to purchase firearms in Arizona. These conversations and
3 photographs of firearms and advertisements for firearm sales are all in a relatively short period. Based
4 on my training and experience, in addition to the seven firearms identified to have been
5 possessed/purchased by CRAMER, the sheer number of photographs of firearms, firearm
6 advertisements, and conversations about the purchase and sale of firearms, I believe that CRAMER has
7 trafficked more than 25 firearms from Arizona to California.

8 4. ***California Highway Patrol Stop on November 24, 2021***

9 57. On or about November 22, 2021, GPS location information showed that CRAMER was
10 traveling back to California from Arizona. Based on details discovered during the investigation, law
11 enforcement decided that an interdiction was necessary in the event CRAMER was transporting
12 additional firearms back to California. Additionally, CRAMER was operating a vehicle with a
13 suspended/revoked driver's license.

14 58. Law Enforcement initiated plans to intercept CRAMER as he returned to the San
15 Francisco Bay Area however CRAMER instead stopped and stayed overnight in the Fresno, California
16 area. Surveillance units were dispatched to the location and observed CRAMER and other unknown
17 associates, but 24/7 surveillance was not possible.

18 59. On or about November 24, 2021, CRAMER's GPS location information indicated that he
19 was traveling back towards the San Francisco Bay Area. Surveillance units were able to locate
20 CRAMER's vehicle, a 2008 Ford Escape registered to his girlfriend D.C., in Oakland, California.

21 60. CHP officers conducted an enforcement stop on the vehicle and contacted CRAMER.
22 CRAMER was found to be in possession of both a fake California driver's license and a fake
23 Washington driver's license in his name. Officers also discovered an orange gun lock, a bag of
24 marijuana with a digital scale, and suspected Alprazolam (Xanax) pills inside the vehicle.

25 61. Additionally, a black trash bag containing numerous over the counter drug store items
26 was found in the vehicle. CHP officers contacted CVS Retail Theft personnel. When entering a CVS
27 store with the items, the anti-theft security system activated. CVS personnel determined the items to be
28 worth approximately \$4,103.55 having been stolen in Arizona.

62. Two cellular phones were recovered from CRAMER. CRAMER was arrested for the possession of the stolen property and then released on scene.

5. *Analysis of Phones Seized in November 2021*

63. On December 8, 2021, a state search warrant was obtained for two cellular phones recovered from CRAMER during the November 24, 2021, vehicle stop, and arrest based on the stolen merchandise found in CRAMER's vehicle. Analysis of the phone showed messages between CRAMER and suspected fences of stolen goods regarding the sale of said goods.

64. On June 12, 2021, CRAMER exchanged a text message conversation with phone number XXX-XXX-9463, known to law enforcement to be I.A., a suspected fence. CRAMER indicated, "I got stuff, are you home I'm close." The two arrange a meet, and I.A. asks CRAMER, "?" to which CRAMER replied, "Small \$1,000."

65. On June 15, 2021, CRAMER again exchanged a message conversation with I.A. CRAMER messages I.A., "I got \$4700 worth of merchandise." CRAMER continues to discuss delivering the merchandise if I.A. sends him money via CashApp or Western Union.

66. Based on Investigator Diehl's experience in retail theft investigations, he immediately recognized these conversations as CRAMER's attempts to sell stolen merchandise.

67. On or about June 26, 2021, the image below was captured to CRAMER's cellular phone. Based on the captions and my training and experience, I believe that CRAMER is bragging about the fact that he is crossing state lines to commit his criminal activity. Additionally, this photograph was captured after his initial firearm arrest on June 1, 2021, showing that the arrest did nothing to deter his criminal activity.

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The text appears to read as follows: “CITY2CITY” “CROSS STATE LINES” “RANCHO VISTA APARTMENTS” “Las Vegas, NV”

6. ***CRAMER is not Listed in the Federal Firearms Licensing System***

68. Queries of the ATF Federal Licensing System (FLS), which houses data for all licensed manufacturers, importers, and dealers of firearms and explosives, were conducted for CRAMER. Negative results show that CRAMER does not have, nor has he ever had, a license to deal in firearms.

III. CONCLUSION

69. Based on the information set forth in the paragraphs above, I submit that there is probable cause to believe that beginning on or about June 1, 2021, in the Eastern District of California, Rondell CRAMER possessed a firearm, in violation of 18 U.S.C. §§ 922(g)(1).

70. Accordingly, based upon the foregoing, I respectfully request that the Court sign the requested criminal complaint and issue the requested arrest warrants.

71. I further request that the Court order that all papers in support of this application, including the affidavit and arrest warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the

1 investigation. Accordingly, there is good cause to seal these documents because their premature
2 disclosure may seriously jeopardize that investigation.

3 72. I declare under penalty of perjury that the statements above are true and correct to the
4 best of my knowledge and belief.

5
6 /s/ Christopher Bailey

7 Christopher Bailey

8 Special Agent

9 Bureau of Alcohol, Tobacco, Firearms and
10 Explosives

11 Subscribed and sworn to me via telephone on: July 7, 2022

12
13 

14 DEBORAH BARNES

15 UNITED STATES MAGISTRATE JUDGE

16 /s/ Adrian T. Kinsella

17 Approved as to form by AUSA ADRIAN T. KINSELLA

United States v. RONDELL CRAMER
Penalties for Criminal Complaint

COUNT 1:

VIOLATION: 18 U.S.C. § 922(g) - Felon in possession of firearm

PENALTIES: Not more than 120 months,
Not more than \$250,000 fine or both
A three-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)